

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b)	
Robertson, Anschutz, Schneid, Crane & Partners, PLLC 130 Clinton Road, Suite 202, Lobby B Fairfield, NJ 07004 Telephone Number 973-575-0707 Attorneys For Secured Creditor Kimberly Wilson, Esq. (031441997)	CASE NO.: 22-18095-JNP CHAPTER 13 Objection to Confirmation of Debtor's Chapter 13 Plan
In Re: Hilda Matta Debtor.	

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

Deutsche Bank National Trust Company, as Trustee for GSAMP Trust 2005-WMC1 ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Modified Chapter 13 Plan (DE # 19), and states as follows:

1. Debtor, Hilda Matta, ("Debtor"), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on October 12, 2022.
2. Secured Creditor holds a security interest in the Debtor's real property located at 201 N New Rd, Pleasantville, NJ 08232, by virtue of a Mortgage recorded on October 18, 2005 at Instrument number 2005111077 of the Public Records of Atlantic County, NJ. Said Mortgage secures a Note in the amount of \$148,000.00.
3. The Debtor filed a Modified Chapter 13 Plan on January 16, 2023.
4. The Plan includes payments toward the Note and Mortgage with Secured Creditor, however the figures used by the Debtor are inaccurate and do not conform to Secured Creditor's timely-filed Proof of Claim. The correct pre-petition arrearage due Secured Creditor is \$2,412.66, whereas the Plan proposes to pay only \$0.00. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5)

and cannot be confirmed. Secured Creditor objects to any plan which proposes to pay it anything less than \$2,412.66 as the pre-petition arrearage over the life of the plan.

WHEREFORE, Secured Creditor respectfully requests this Court sustain the objections stated herein and deny confirmation of Debtor's Plan, and for such other and further relief as the Court may deem just and proper.

Robertson, Anschutz, Schneid, Crane & Partners,
PLLC
Attorney for Secured Creditor
130 Clinton Road, Suite 202, Lobby B
Fairfield, NJ 07004
Telephone Number 973-575-0707

By: /s/Kimberly Wilson
Kimberly Wilson, Esquire
NJ Bar Number 031441997
Email: kimwilson@raslg.com

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Robertson, Anschutz, Schneid, Crane & Partners, PLLC 130 Clinton Road, Suite 202, Lobby B Fairfield, NJ 07004 Telephone Number 973-575-0707 Attorneys For Secured Creditor Kimberly Wilson, Esq. (031441997)	CASE NO.: 22-18095-JNP CHAPTER 13 Objection to Confirmation of Debtor's Chapter 13 Plan
In Re: Hilda Matta Debtor.	

CERTIFICATION OF SERVICE

1. I, Kimberly Wilson, represent Deutsche Bank National Trust Company, as Trustee for GSAMP Trust 2005-WMC1 in this matter.
2. On January 30, 2023, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below.
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

1/30/2023

Robertson, Anschutz, Schneid, Crane & Partners,
PLLC
Attorney for Secured Creditor
130 Clinton Road, Suite 202, Lobby B
Fairfield, NJ 07004
Telephone Number 973-575-0707

By: /s/Kimberly Wilson
Kimberly Wilson, Esquire
NJ Bar Number 031441997
Email: kimwilson@raslg.com

<u>Name and Address of Party Served</u>	<u>Relationship of Party to the Case</u>	<u>Mode of Service</u>
Seymour Wasserstrum Law Offices of Seymour Wasserstrum 205 West Landis Avenue Vineland, NJ 08360	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
Hilda Matta 28 Virginia Ave Northfield, NJ 08225	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002	Chapter 13 Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)